

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<b>WSOU INVESTMENTS, LLC D/B/A</b>	§	
<b>BRAZOS LICENSING AND</b>	§	<b>CIVIL ACTION 6:20-cv-00984-ADA</b>
<b>DEVELOPMENT,</b>	§	
<i>Plaintiff,</i>	§	
	§	
<b>v.</b>	§	
	§	
<b>CANON, INC.,</b>	§	
<i>Defendant.</i>	§	
	§	

**JOINT STIPULATION OF DISMISSAL**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) and Defendant Canon, Inc. (“Canon”) (collectively, “Parties”) hereby stipulate through their respective counsel of record as follows:

WHEREAS, on October 19, 2020, WSOU filed a Complaint for Patent Infringement against Canon alleging infringement of U.S. Patent No. 8,909,661 (“the ’661 Patent”) in the United States District Court for the Western District of Texas (Dkt. 1);

WHEREAS, on December 14, 2020, Canon waived service of summons (Dkt. 9);

WHEREAS, on March 15, 2021, Canon filed: (1) a Motion to Dismiss Complaint for Patent Infringement (Dkt. 13), in which Canon sought the dismissal of WSOU’s claims for induced and contributory infringement of the ’661 Patent; and (2) an Answer to Complaint for Patent Infringement (Dkt. 14); and

WHEREAS, the Parties desire to resolve the above-entitled action.

**THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by and between WSOU and Canon through their respective undersigned counsel that:

- WSOU's claims for direct and indirect infringement of the '661 Patent against Canon based solely on Canon's EOS 6D Mark II camera ("Accused Product") and any other Canon cameras using GPS to record a UTC timestamp as is done in the Accused Product ("Dismissed Products") shall be dismissed WITH PREJUDICE;
- WSOU's claims for direct and indirect infringement of the '661 Patent that WSOU has or may have in the future, including any claims of past, present, or future infringement of the '661 Patent against Canon and/or any of Canon's affiliates, subsidiaries, customers, or partners with respect to any Canon products and/or services other than the Dismissed Products, shall be dismissed WITHOUT PREJUDICE;
- WSOU reserves and does not waive any rights or defenses as to WSOU's patent infringement claims against Canon in other actions, including, but not limited to the claims concerning: (1) U.S. Patent No. 7,054,346 in Case No. 6:20-cv-00980-ADA; (2) U.S. Patent No. 7,116,714 in Case No. 6:20-cv-00981-ADA; and (3) U.S. Patent No. 8,588,537 in Case No. 6:20-cv-00982-ADA; and
- Each party will bear its own costs, expenses, and attorneys' fees.

IT IS SO STIPULATED.

April 26, 2021

Respectfully submitted,

/s/ Jonathan K. Waldrop

Jonathan K. Waldrop (CA Bar No. 297903)  
(Admitted in this District)  
jwaldrop@kasowitz.com  
Darcy L. Jones (CA Bar No. 309474)  
(Admitted in this District )

/s/ John M. Jackson

John M. Jackson (Texas Bar No. 24002340)  
jjackson@jw.com  
**JACKSON WALKER, LLP**  
2323 Ross Avenue, Suite 600  
Dallas, TX 75201

djones@kasowitz.com  
Marcus A. Barber (CA Bar No. 307361)  
(Admitted in this District)  
mbarber@kasowitz.com  
John W. Downing (CA Bar No. 252850)  
(Admitted in this District)  
jdowning@kasowitz.com  
Heather S. Kim (CA Bar No. 277686)  
(Admitted in this District)  
hkim@kasowitz.com  
Jack Shaw (CA Bar No. 309382)  
(Admitted in this District)  
jshaw@kasowitz.com

**KASOWITZ BENSON TORRES LLP**  
333 Twin Dolphin Drive, Suite 200  
Redwood Shores, California 94065  
Telephone: (650) 453-5170  
Facsimile: (650) 453-5171

Mark D. Siegmund (TX Bar No. 24117055)  
mark@waltfairpllc.com  
**LAW FIRM OF WALT FAIR, PLLC**  
1508 N. Valley Mills Drive  
Waco, TX 76710  
Telephone: (254) 772-6400  
Facsimile: (254) 772-6432

**ATTORNEYS FOR PLAINTIFF**  
**WSOU INVESTMENTS, LLC**  
**d/b/a BRAZOS LICENSING AND**  
**DEVELOPMENT**

Tel: (214) 953-6000  
Fax: (214) 953-5822

Joseph A. Calvaruso (*pro hac vice*)  
jcalvaruso@orrick.com  
Richard F. Martinelli (*pro hac vice*)  
rmartinelli@orrick.com  
**ORRICK, HERRINGTON & SUTCLIFFE LLP**  
51 West 52nd Street  
New York, NY 10019-6142  
Tel: (212) 506-5000  
Fax: (212) 506-5151

**ATTORNEYS FOR DEFENDANT**  
**CANON, INC.**

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE] — Document Filing System, to all counsel of record, on this 26th day of April, 2021.

/s/ Jonathan K. Waldrop  
**Jonathan K. Waldrop**